

**VIA ECF**

The Honorable Arun Subramanian  
United States District Court, Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007-1312

**Re:    *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC**

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.<sup>1</sup>
- Defendants' contract reviewers have reviewed approximately 3,600,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference, including approximately 500,000 documents since Defendants' last update on January 17, 2024.
- Defendants have produced over 980,000 documents and over 26 billion observations of data covering 7 different countries in this litigation to date, including approximately 180,000 documents and 14.7 billion observations of data since Defendants' last update on January 17, 2024.

*[signatures on following page]*

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<sup>1</sup> Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: January 31, 2025

Respectfully submitted,

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cc: All Counsel of Record (via ECF)